

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

PERRY BROWN

Plaintiff

v.

STATE OF MARYLAND, et al.

Defendants

\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*

Civil No. PJM 07-1956

**VERDICT SHEET**

**PART I**

In Part I, you are asked to determine whether Mr. Brown has proved his claim against Deputy Handy **for violation of his federal and state constitutional rights** to be free from unreasonable and excessive force in the course of an arrest.

- (1) Do you find by a preponderance of the evidence that the force used by Deputy Handy was both objectively unreasonable and excessive based on the facts and circumstances that confronted him at the time?

Yes \_\_\_\_\_

No ✓ \_\_\_\_\_

- (2) Do you find by a preponderance of the evidence that Deputy Handy acted mistakenly but nonetheless reasonably in applying force to Mr. Brown?

Yes \_\_\_\_\_

No \_\_\_\_\_

- (3) If your answer to Question (1) is "yes" and to Question (2) is "no," based on a preponderance of the evidence, what compensatory damages, if any, do you award Mr. Brown?

Medical Expenses: \$ \_\_\_\_\_

Pain and Suffering: \$ \_\_\_\_\_

TOTAL \$ \_\_\_\_\_

- (4) If your answer to Question (1) is "yes" and Question (2) is "no," do you find by a preponderance of the evidence that Deputy Handy acted with reckless disregard of Mr. Brown's rights?

Yes \_\_\_\_\_

No \_\_\_\_\_

- (5) If your answer to Question (4) is "yes," based on a preponderance of the evidence, what punitive damages, if any, do you award Mr. Brown?

\$ \_\_\_\_\_

## **PART II**

In Part II, you are asked to determine whether Mr. Brown has proved his claim of **battery** against the State of Maryland based on the actions of Deputy Handy.

- (1) Do you find by a preponderance of the evidence that Deputy Handy committed a battery in using force against Mr. Brown?

Yes \_\_\_\_\_

No ✓ \_\_\_\_\_

- (2) If your answer to Question (1) is "yes," based on a preponderance of the evidence, what compensatory damages, if any, do you award Mr. Brown for:

Medical Expenses:

\$ \_\_\_\_\_

Pain and Suffering:

\$ \_\_\_\_\_

TOTAL

\$ \_\_\_\_\_

(The total compensatory damages should be in the same amount as any compensatory damages awarded in Part I of this Verdict Sheet.)

2/20/2009

Date

**SIGNATURE REDACTED**